



Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022  
+1 212 909 6000

**VIA ECF AND EMAIL**

March 11, 2022

Hon. Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Bilalov v. Gref et al.*, 1:20-cv-09153-AT-JW (S.D.N.Y.)

Dear Judge Torres:

We write on behalf of Defendants Sberbank of Russia and Herman Gref (together, the “Russian Defendants”) regarding what Plaintiff styles as his *Ex Parte* Emergency Motion For An Asset Freeze and Other Relief (ECF Nos. 81-84) (the “Motion”).<sup>1</sup> We wish to advise the Court that the Russian Defendants “intend to oppose entry of the TRO” before the Court-ordered deadline of March 14, 2022. *See* Order (ECF No. 85).

Counsel for the Russian Defendants have been authorized to inform the Court that they intend to withdraw from this representation and are working with the Russian Defendants to identify substitute counsel. Debevoise does not anticipate—and in all events will work to mitigate—any delay or prejudice to any party resulting from the engagement of new counsel, including because, aside from this Motion, the pending motions to dismiss are fully briefed.

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

By: /s/ William H. Taft V

Mark P. Goodman  
William H. Taft V  
mpgoodman@debevoise.com  
whaft@debevoise.com  
919 Third Avenue  
New York, New York 10022  
(212) 909-6000

*Counsel for Sberbank of Russia and Herman  
Gref*

cc: All counsel of record (via ECF)

---

<sup>1</sup> The Russian Defendants expressly preserve all rights, privileges, defenses and immunities, including the defenses of foreign sovereign immunity and lack of subject-matter and personal jurisdiction under the Foreign Sovereign Immunities Act, 28 U.S.C. §§ 1330, 1602–1611.